

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

BONGO PRODUCTIONS, LLC, ROBERT  
BERNSTEIN, SANCTUARY PERFORMING  
ARTS LLC, AND KYE SAYERS,

Plaintiffs,

v.

CARTER LAWRENCE, Tennessee State Fire  
Marshal, in his official capacity,  
CHRISTOPHER BAINBRIDGE, Director of  
Codes Enforcement, in his official capacity,  
GLENN R. FUNK, District Attorney General for  
the 20th Judicial District, in his official capacity,  
and NEAL PINKSTON, District Attorney  
General for the 11<sup>th</sup> Judicial District, in his  
official capacity,

Defendants.

Civ. Action  
3:21-cv-00490

JUDGE TRAUGER

**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Rule 83.01(b) of the Local Rules of this Court, Thomas H. Castelli, a member of the bar of this Court, hereby moves for the admission *pro hac vice* of Malita Picasso, an attorney at the American Civil Liberties Union, 125 Broad Street, 18th Floor, New York, NY 10004, 212-549-2561, mpicasso@aclu.org, for the purposes of this litigation in this Court as counsel for plaintiffs.

1. Malita Picasso does not reside in this district and does not maintain an office in this district for the practice of law.

2. Malita Picasso is a member in good standing of the U.S. Court of Appeals for the Ninth Circuit. A certificate of good standing and sworn statement regarding disciplinary, contempt,

and criminal proceedings are attached, and the filing fee in the amount of \$150.00 has been paid to the Clerk via the Court's electronic payment system.

Dated: October 20, 2021

Respectfully submitted,

/s/ Thomas H. Castelli  
Thomas H. Castelli (No. 24849)  
Stella Yarbrough (No. 33637)  
American Civil Liberties Union  
Foundation of Tennessee  
P.O. Box 120160  
Nashville, TN 37212  
Tel: (615) 320-7142  
tcastelli@aclu-tn.org  
syarbrough@aclu-tn.org

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the 20th Judicial District, in his official capacity,  
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General for the 11<sup>th</sup> Judicial District, in his  
official capacity,

Defendants.

Civ. Action  
3:32-cv-00490

JUDGE TRAUGER

**DECLARATION OF MALITA PICASSO**

1. I hereby certify that I am a member in good standing of the of the U.S. Court of Appeals for the Ninth Circuit. A true and correct copy of my Certificate of Good Standing is included with the motion for my admission *pro hac vice*.

2. I also declare under penalty of perjury that I am not, nor have I ever been, the subject of criminal proceedings nor disciplinary proceedings by any disciplinary authority, nor have I had a finding of contempt or a sanction against me under 28 U.S.C. § 1927.

Dated: October 20, 2021

Respectfully submitted,

/s/ Malita V. Picasso

Malita Picasso

American Civil Liberties Union Foundation

125 Broad Street, 18th Floor

New York, NY 10004

Tel: (212) 549-2561

mpicasso@aclu.org

## CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2021 a true and correct copy of the foregoing motion was served on the Tennessee Attorney General's Office, counsel for all Defendants, via the Court's ECF/CM system.

Alexander S. Rieger  
Rainey A. Lankford  
Office of the Attorney General and Reporter  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
Alex.rieger@ag.tn.gov  
Rainey.lankford@ag.tn.gov

/s/ Thomas H. Castelli  
Thomas H. Castelli (No. 24849)  
American Civil Liberties Union  
Foundation of Tennessee  
P.O. Box 120160  
Nashville, TN 37212  
Tel: (615) 320-7142  
tcastelli@aclu-tn.org